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November 21, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Cheryl L. Pollak, U.S.M.J.
225 Cadman Plaza East
Courtroom 13B South
Brooklyn, NY 11201-1804

Re: Ortega v. Champagne Room BK, Inc., et al.
Case No.: 1:21-cv-1125 (NGG) (CLP)

Dear Judge Pollak:

This office represents the Plaintiff Iuminada Ortega (hereinafter the “Plaintiff”) in the above referenced case. Plaintiff writes to respectfully request an extension of time of two (2) weeks to file an amended complaint and the motion for settlement approval, thereby extending the deadline to December 5, 2024. Plaintiff sought Defendants’ consent but Defendants have not provided their position. We submit that the Court should exercise its discretion in favor of granting the requested extension due to your undersigned’s engagement before the Hon. Nina R. Morrison, U.S.D.J. for an evidentiary hearing in the case Paccha v. APS Electric Inc., No.: 1:23-cv-2075 (NRM) (MMH) earlier today which took substantial time to prepare for and prevented your undersigned from earlier meeting the instant deadline. See Fed. R. Civ. P. 6(b)(1)(A).

Plaintiff thanks this honorable Court for its time and attention to this case.

Dated: Jamaica, New York
November 21, 2024

Respectfully submitted,
SAGE LEGAL LLC
/s/ Emanuel Kataev, Esq.
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